

IDOI

INDIANA DEPARTMENT OF INSURANCE 311 W. WASHINGTON STREET, SUITE 300 INDIANAPOLIS, INDIANA 46204-2787 TELEPHONE: (317) 232-2385 FAX: (317) 232-5251

Stephen W. Robertson, Commissioner

April 20, 2011

United States Department of Health & Human Services The Honorable Kathleen Sebelius Secretary of Health & Human Services 200 Independence Avenue S.W. Washington, DC 20201

Dear Madam Secretary:

On behalf of the Indiana Department of Insurance (IDOI), which manages the State Health Insurance Assistance Program (SHIP), I write in response to the recent decision to transfer SHIP programs from the Centers for Medicare & Medicaid Services (CMS) to the Administration on Aging (AoA). After discussion with the Governor and our sister agency, the Family and Social Services Administration, we believe it is critical for the federal government to support the decision of an individual state to maintain its SHIP in the state's Department of Insurance and equally important for SHIP programs to continue to receive support and assistance from CMS.

IDOI has managed a strong and effective statewide SHIP for more than 18 years. Indiana SHIP's success is attributable to its partnership with IDOI and the insurance industry. This working relationship facilitates consumer education and counseling on Medicare and insurance related issues. IDOI's unique knowledge and regulation of the insurance industry adds value through enhanced consumer protections for Medicare beneficiaries. With the increase in the Medicare-eligible population, the insurance and regulation expertise provided through the current partnership between IDOI and SHIP is essential to assist those seeking access to Medicare, Medicare Advantage, and Part D drug plans.

Similarly, SHIP's working relationship with CMS has allowed it to focus on a wider population than those receiving services from its Division of Aging. For example, SHIP administers MIPPA funding to the state's 16 Area Agencies on Aging for low-income enrollment assistance through a Memorandum of Understanding with the Indiana Division of Aging. SHIP provides comprehensive counseling assistance not only to clients of aging services but also a wide spectrum of beneficiaries, caregivers, providers, and insurance agents.

Indiana SHIP's extensive network includes 131 local sites where face-to-face counseling is available, 58 sponsoring agencies (including Area Agencies on Aging, senior centers, senior and low-income housing, churches, libraries, hospitals) that provide these facilities and office support, and 314 volunteer counselors. Restructuring the SHIP call center, office operations, and website to another state agency that lacks insurance and Medicare expertise may diminish the quality assistance Indiana SHIP has previously provided. In order to protect the superior service level currently provided to Medicare beneficiaries by SHIP, IDOI advocates that AOA allow IDOI to continue its partnership with SHIP.

Sincerely, Septem W. Robertson

Stephen W. Robertson Commissioner of Insurance

Cc: Administrator Don Berwick, Centers for Medicare and Medicaid Services Assistant Secretary for Aging Kathy Greenlee, Administration on Aging